

FOX ROTHSCHILD LLP

(Formed in the Commonwealth of Pennsylvania)

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*Proposed Counsel to the Debtor and
Debtor in Possession*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD MCBRIDE, JOHN BEVERLY,
VICTOR LAMSON, DONALD TAYLOR, RYAN
FENNAL, MICHAEL VENEZIALE, THOMAS
MONZO, MANUEL MARTINEZ, DANIEL
MITCHELL, KEVIN CUNNINGHAM, JUAN
LOPEZ, WAYNE GROVE, WILLIAM NEWNAM,
JR., and RYAN SHORT,

Plaintiffs,

v

KLINE CONSTRUCTION CO., INC., KLINE
CONSTRUCTION CO., INC. 401(K) PLAN,
KATHERINE KLINE-PENATE, J. EDWARD
KLINE, and ROBERT MILLER,

Defendants.

Civil Action No. 19-cv-14275

**SUGGESTION OF BANKRUPTCY FOR
KLINE CONSTRUCTION CO., INC.**

PLEASE TAKE NOTICE that on August 14, 2019, a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) was filed in the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), by Kline Construction Co., Inc., as debtor and debtor in possession (the “Debtor”), and assigned case no. 19-25752 (the “Chapter 11 Case”).

PLEASE TAKE FURTHER NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the Debtor's commencement of the Chapter 11 Case operates as an automatic stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtor, including the above-captioned case against the Debtor; (b) the enforcement, against the Debtor or against any property of the Debtor's bankruptcy estate, of a judgment obtained before the commencement of the Debtor's Chapter 11 Case; or (c) any act to obtain possession of property of or from the Debtor's bankruptcy estate, or to exercise control over property of the Debtor's bankruptcy estate. Any such action taken without prior entry of an order by the Bankruptcy Court modifying the automatic stay for that specific action is void and may subject the party to sanctions.

Dated: August 21, 2019

/s/ Michael J. Viscount

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